

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

v.

**Affirmation in Support of  
Application for Order of Continuance**

RONALD ROMANO,

**20 Mag. 5276**

*Defendant.*

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State of New York )  
County of New York : ss.:  
Southern District of New York )

Nicholas W. Chiuchiolo, pursuant to Title 28, United States Code, Section 1746, hereby declares under penalty of perjury:

1. I am an Assistant United States Attorney in the Office of Audrey Strauss, Acting United States Attorney for the Southern District of New York. I submit this affirmation in support of an application for an order of continuance of the time within which an indictment or information would otherwise have to be filed, pursuant to 18 U.S.C. § 3161(h)(7)(A).

2. RONALD ROMANO was arrested on May 26, 2020. The defendant was charged in a complaint dated May 21, 2020, with violations of 18 U.S.C. §§ 1349, 1343, 2, and 371. The defendant was presented before Magistrate Judge Ona T. Wang on May 26, 2020, and was represented by Mark Macron, Esq. Judge Wang ordered the defendant released subject to certain conditions.

3. At presentment, defense counsel consented to a waiver of his client's right pursuant to Rule 5.1 of the Federal Rules of Criminal Procedure to a preliminary hearing within 14 days of the

initial appearance. Accordingly, under the Speedy Trial Act the Government initially had 30 days to file an indictment or information.

4. On or about June 17, 2020, the Government submitted to the Honorable James L. Cott, with the consent of defense counsel, a request for a 30-day adjournment of the date by when the Government must file an indictment or information, which Judge Cott signed on or about that same day.

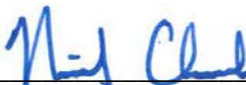
5. On or about June 30, 2020, Mark Macron, Esq., counsel for RONALD ROMANO, consented to an additional 30-day continuance of the date by when the Government must file an indictment or information so that the parties can continue to discussion a pretrial disposition of this matter. On or about July 16, 2020, the Honorable Robert W. Lehrburger, United States Magistrate Judge for the Southern District of New York, adjourned the date by when the Government must file an information or indictment until August 26, 2020. On or about August 19, 2020, the Honorable Debra Freeman, United States Magistrate Judge for the Southern District of New York, adjourned the date by when the Government must file an indictment or information until September 25, 2020. On or about September 25, 2020, the Honorable Sarah Netburn, United States Magistrate Judge for the Southern District of New York, adjourned the date by when the Government must file an indictment or information until October 26, 2020.

6. On or about October 19, 2020, Mark Macron, Esq., counsel for RONALD ROMANO, consented to an additional 30-day continuance of the date by when the Government must file an indictment or information so that the parties can continue to discuss a pretrial disposition of this matter.

Accordingly, the new date by when the Government must file an indictment or information would be November 25, 2020.

6. For the reasons stated above, the ends of justice served by the granting of the requested continuance outweigh the best interests of the public and defendant in a speedy trial.

Dated: New York, New York  
October 21, 2020

  
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NICHOLAS W. CHIUCHIOLO  
Assistant United States Attorney  
212-637-1247

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Upon the application of the United States of America and the affirmation of Nicholas W. Chiuchiolo, Assistant United States Attorney for the Southern District of New York, it is found that RONALD ROMANO, the defendant, who was arrested on May 26, 2020, and who was charged with violations of 18 U.S.C. §§ 1343, 1349, 2, and 371 in a complaint dated May 21, 2020;

It is further found that the defendant was presented before Magistrate Judge Ona T. Wang on May 26, 2020, and was ordered released subject to certain conditions;

It is further found that RONALD ROMANO waived his right to a preliminary hearing, and Magistrate Judge Wang set June 25, 2020 as the date by when the Government must file an indictment or information;

It is further found that on or about June 17, 2020, the Honorable James L. Cott, United States Magistrate Judge for the Southern District of New York, adjourned the date by when the Government must file an indictment or information until July 27, 2020;

It is further found that on or about July 16, 2020, the Honorable Robert W. Lehrburger, United States Magistrate Judge for the Southern District of New York, adjourned the date by when the Government must file and indictment or information until August 26, 2020;

It is further found that on or about August 19, 2020, the Honorable Debra Freeman, United States Magistrate Judge for the Southern District of New York, adjourned the date by when the Government must file an indictment or information until September 25, 2020;

It is further found that on or about September 25, 2020, the Honorable Sarah Netburn, United States Magistrate Judge for the Southern District of New York, adjourned the date by when the Government must file an indictment or information until October 26, 2020;

It is further found that the Government has requested a continuance of 30 days of the preliminary hearing date, and that Mark Macron, Esq., counsel for RONALD ROMANO, has advised the attorneys for the Government that his client consents to a 30-day adjournment of the date by when the Government must file an indictment or information so that the parties can continue to discuss a pretrial disposition of this matter;

It is further found that the granting of such a continuance best serves the ends of justice and outweighs the best interests of the public and the defendant in a speedy trial; and therefore it is

ORDERED that the request for a continuance pursuant to 18 U.S.C. §3161(h)(7)(A) is hereby granted until November 25, 2020 for RONALD ROMANO.

Dated: New York, New York  
October 26, 2020



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ONA T. WANG  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK